



City of
OLYMPIA

P.O. Box 1967, Olympia, WA 98507-1967

Department of Ecology
Water Quality Program

SEP 23 2005

September 21, 2005

Mr. Bill Moore
Western Washington Municipal Stormwater Comment
Washington State Department of Ecology, Water Quality Program
P.O. Box 47600
Olympia, WA 98504-7600

Dear Mr. Moore:

**SUBJECT: City of Olympia Comments on Appendix 6 of Preliminary Draft
Phase II Municipal Stormwater Permit for Western Washington**

Thank you for the opportunity to extend our earlier comments on the preliminary draft permit to include *Appendix 6 – Annual Report Form – Phase II Municipal Stormwater Permit*. Again, I would like to compliment Ecology staff for their efforts and receptiveness to receiving comments.

You requested comments specifically on the extent of detail and format of this appendix. The extent of detail appears consistent with the rest of the draft permit and 40 CFR 122.35(g) (3). I do feel the level of information communicated could be improved with some changes in format.

S7.A.3 states, "Each Permittee shall prepare written documentation of their SWMP (Stormwater Management Program) in accordance with S9. The documentation of the SWMP shall be organized according to the program components in S7.C and shall be updated annually." This suggests the need for a document in addition to *Appendix 6* to be maintained annually.

I believe a change in the format of *Appendix 6* could eliminate this potential duplication of effort and more fully communicate the nature of a permittee's program. The proposed changes include reorganizing the structure of the appendix to match the permit structure, and adding detail where necessary to fulfill the requirements of S7.A.3 and S7.A.4.

The effect of the proposed changes would be to present *Appendix 6* as a template for documentation of a permittee's SWMP. The annual update of the SWMP Plan would then serve as the permittee's annual report.

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Mr. Bill Moore
Western Washington Municipal Stormwater Comment
September 21, 2005
Page 2

I have enclosed a modified version of *Appendix 6* to illustrate my above comments. The enclosed document admittedly "needs work" but should help clarify the idea of creating a single document that merges all of a permittee's documentation requirements into one clear and concise format.

If you have any questions regarding these comments, please feel free to contact me at (360) 753-8321.

Sincerely,



VINCE MCGOWAN
Senior Program Specialist
Public Works Department

VM/hrr
F:\Vince McGowan\VM Moore NPDES Appendix 6 Comments 092105.doc
Enclosure

Appendix 6

Stormwater Management Program (SWMP) Plan

This appendix is provided as a template for documentation of the jurisdiction's SWMP. The annual update of this document will also serve as the jurisdiction's annual report.

The goals of this annually updated plan are:

- 1) To concisely document implementation of the Stormwater Management Program during the past year
- 2) To evaluate program results for continuous improvement
- 3) To determine compliance with this permit
- 4) To share information with other permittees, decision makers, and the public

Each permittee, co-permittee and secondary permittee must complete the applicable form in its entirety. Upon completion, the form shall be submitted to Ecology: 2 hard copies and an electronic copy in pdf format if available. Attachments should be included where necessary to provide sufficient information on program implementation.

****All instructions (written in italic green text) should be deleted during report preparation.***

As required in 40 CFR 122.35(g) (3) this report includes:

- (i) The status of compliance with permit conditions, an assessment of the appropriateness of identified best management practices and progress towards achieving identified measurable goals for each of the minimum control measures
- (ii) Results of information collected and analyzed, including monitoring data, if any, during the reporting period
- (iii) A summary of the storm water related activities planned during the next reporting cycle
- (iv) A change in any identified best management practices or measurable goals for any of the minimum control measures
- (v) Notices of relying on another governmental entity to satisfy some permit obligations (if applicable)

S1. Permit Coverage Area and Criteria

Does this document reflect implementation of the SWMP to the entire area of
(insert jurisdiction name) requiring coverage under the Western Washington Phase 2
Municipal Stormwater permit?

☐ Yes
☐ No

The estimated jurisdictional area where the SWMP is applied beyond the area requiring
coverage under the Western Washington Phase 2 Municipal Stormwater permit is _____.

Have there been any annexations or incorporations during the previous
reporting period that affected permit coverage area?

☐ Yes
☐ No

*If yes, attach a map of the area affected, and briefly describe here the implications for the
stormwater management program.*

Permittee Name: _____

State of Washington Phase 2 Municipal Stormwater Permit #: _____

Reporting Year: _____

Permittee contact person: _____

Title: _____

Address: _____

Phone: _____

E-mail: _____

Permittee responsible official: _____

Title: _____

Address: _____

Phone: _____

E-mail: _____

"I certify under penalty of law, that this document and all attachments were prepared
under my direction or supervision in accordance with a system designed to assure that
qualified personnel properly gathered and evaluated the information submitted. Based on
my inquiry of the person or persons who manage the system or those persons directly
responsible for gathering information, the information submitted is, to the best of my
knowledge and belief, true, accurate, and complete. I am aware that there are significant
penalties for submitting false information, including the possibility of fine and
imprisonment for willful violations."

Please refer to General Condition G19 - Certification and Signature in the Western Washington Phase II Municipal Stormwater Permit for information on acceptable signatory authority.

S1.D.1 Permittee Status _____ (Permittee Co-permittee or Secondary Permittee)

S2. Authorized Discharges

Did _____ (insert jurisdiction name) SWMP comply with all requirements under this permit section during the past reporting year?

☐ Yes

☐ No

If not, include here an explanation of those items complied with or not complied with

S3. Responsibilities of Permittees, Co-Permittees, and Secondary Permittees

Please fill in the table below to document how the components of your program are implemented within your jurisdiction. If you are a Co-Permittee, include a listing of components of your SWMP implemented by another entity that entities name (ex. S7.C.1 a.iv - Puget Sound County - provides brochures to businesses), and a brief description of the component.

The table below shows how the SWMP is coordinated within _____ (insert jurisdiction name).

SWMP Activity (by permit section)	Implementing Division/Department(s)	Comments
(ex.) S7.C.1 a.v	Community Planning and Stormwater Utility	includes technical documents trainings, etc.

S4. Total Maximum Daily Load Allocations

The following table, lists all named receiving waters within (insert jurisdiction name) and ¼ mile downstream, and indicates those identified as impaired pursuant to Clean Water Act Section 303(d), and those with an existing Total Maximum Daily Load (TMDL). Information is from: www.ecy.wa.gov/programs/wq/links/impaired_wtrs.html

Table S4. - 1

WRIA	Water Body Name (and New ID # if avail.)	Impaired?	Parameters	TMDL?
		<input type="checkbox"/> Yes / <input type="checkbox"/> No		<input type="checkbox"/> Yes / <input type="checkbox"/> No
		<input type="checkbox"/> Yes / <input type="checkbox"/> No		<input type="checkbox"/> Yes / <input type="checkbox"/> No
		<input type="checkbox"/> Yes / <input type="checkbox"/> No		<input type="checkbox"/> Yes / <input type="checkbox"/> No
		<input type="checkbox"/> Yes / <input type="checkbox"/> No		<input type="checkbox"/> Yes / <input type="checkbox"/> No
		<input type="checkbox"/> Yes / <input type="checkbox"/> No		<input type="checkbox"/> Yes / <input type="checkbox"/> No
		<input type="checkbox"/> Yes / <input type="checkbox"/> No		<input type="checkbox"/> Yes / <input type="checkbox"/> No
		<input type="checkbox"/> Yes / <input type="checkbox"/> No		<input type="checkbox"/> Yes / <input type="checkbox"/> No
		<input type="checkbox"/> Yes / <input type="checkbox"/> No		<input type="checkbox"/> Yes / <input type="checkbox"/> No
		<input type="checkbox"/> Yes / <input type="checkbox"/> No		<input type="checkbox"/> Yes / <input type="checkbox"/> No
		<input type="checkbox"/> Yes / <input type="checkbox"/> No		<input type="checkbox"/> Yes / <input type="checkbox"/> No
		<input type="checkbox"/> Yes / <input type="checkbox"/> No		<input type="checkbox"/> Yes / <input type="checkbox"/> No
		<input type="checkbox"/> Yes / <input type="checkbox"/> No		<input type="checkbox"/> Yes / <input type="checkbox"/> No
		<input type="checkbox"/> Yes / <input type="checkbox"/> No		<input type="checkbox"/> Yes / <input type="checkbox"/> No
		<input type="checkbox"/> Yes / <input type="checkbox"/> No		<input type="checkbox"/> Yes / <input type="checkbox"/> No
		<input type="checkbox"/> Yes / <input type="checkbox"/> No		<input type="checkbox"/> Yes / <input type="checkbox"/> No
		<input type="checkbox"/> Yes / <input type="checkbox"/> No		<input type="checkbox"/> Yes / <input type="checkbox"/> No
Please list any water bodies for which a TMDL, pollution prevention plan, water quality monitoring program, or other relevant program is in place or in development.				

Does (insert jurisdiction name) have an applicable Total Maximum Daily Load (TMDL) in effect for one or more of its water bodies? (See Appendix 3)

☐ Yes
☐ No

If yes, is a Summary Implementation Report attached to this annual report form as required in S4 C.2?

☐ Yes
☐ No (if no, explain)

Does the TMDL specifically require water quality monitoring?

☐ Yes
☐ No

If yes, complete the following section. If no, delete the following section.

Have you developed and implemented a TMDL monitoring Quality Assurance Project Plan (QAPP) within first 90 days after issuance of the permit as required in S4.C.1?

☐ Yes

☐ No (if no, explain)

Has the monitoring plan been submitted to the Department in Paper and electronic form as required in S4.C.1?

☐ Yes

☐ No (if no, explain)

Does the monitoring plan include detail discussion and a discussion of the goal and objective(s), monitoring, (experimental) design, and sampling and analytical methods as required in S4.C.1.a?

☐ Yes

☐ No (if no, explain)

Does the monitoring plan include a list and maps of the selected TMDL monitoring sites as required in S4.C.1.b?

☐ Yes

☐ No (if no, explain)

Does the monitoring plan include the frequency of data to be collected at the monitoring sites as required in S4.C.1.c?

☐ Yes

☐ No (if no, explain)

Does the monitoring plan include method and location of precipitation measuring devices as required in S4.C.1.d?

☐ Yes

☐ No (if no, explain)

Does the monitoring plan included triggers for automated flow monitoring devices as required in S4.C.1.e?

☐ Yes

☐ No (if no, explain)

Does the monitoring plan include the parameters to be measured, as appropriate and relevant to the TMDL as required in S4.C.1.f?

☐ Yes

☐ No (if no, explain)

Have you implemented the QAPP within the first 180 days of the permit issuance date as required in S4.C.1.g?

☐ Yes

☐ No (if no, explain)

S5. Compliance with Standards

S5.B Existing Stormwater Discharges – During the past reporting year, has (insert jurisdiction name) reduced the discharge of pollutants to the maximum extent practicable (MEP)?

- ☐ Yes
☐ No

If no, provide a brief description of why MEP was not met.

S5.C New Stormwater Discharges – During the past reporting year, has (insert jurisdiction name) complied with water quality standards as defined in this section?

- ☐ Yes
☐ No

If no, complete the following section. If yes, delete the following section.

Have you required the project proponents to adopt a new standard?

- ☐ Yes
☐ No (if no, explain)

Have you required the project proponent to demonstrate that the new stormwater discharge using the new standard does not cause or contribute a violation of applicable surface water, ground water and sediment management standards as required in S5.C?

- ☐ Yes
☐ No (if no, explain)

Have you received documentation from the project proponents that demonstrate how the BMPs were selected, the expected pollutants removal estimated, any technical basis which support the performance claims for the selected BMPs, and an assessment of how the selected BMPs will comply with applicable State Water Quality Standards and it will satisfy the state requirement under Chapter 90.48 RCW to apply all known, available, reasonable method of prevention, control, and treatment (AKART) prior to discharge as required in S5.C?

- ☐ Yes
☐ No (if no, explain)

Are you requiring the new discharges to install all applicable BMPs (as above) prior to discharge and comply with the standards immediately after the discharge?

- ☐ Yes
☐ No (if no, explain)

S6. Monitoring

The comprehensive long-term water quality monitoring program required no later than 4 years from the effective date of the permit as described in S6.A is to be submitted to The Department separately.

S7. Stormwater Management Program

S7.A Have you tracked costs of development and implementation of the SMWP as required by S7.A.4.a?

☐ Yes

☐ No (if no, explain)

If yes, complete Table S7-1 to the extent that accurate information or reasonable estimates are available.

Table S7. – 1

S7.C.1. Public Education and Outreach	
S7.C.2 Public Involvement and Participation	
S7.C.3 Illicit Discharge Detection and Elimination	
S7.C.4. Controlling runoff from New Development and Redevelopment, and Construction Sites a. Plan review and permitting b. Inspections and enforcement	
S7.C.5. Pollution Prevention and Operation and Maintenance for Municipal Operations a. Inspection program for municipally owned stormwater facilities b. Maintenance of permittee's stormwater facilities c. Catch basin maintenance d. Roads maintenance practices, and related programs	
S4. TMDL implementation	
S6 Monitoring	
Administrative Costs	
Total	<u> </u>

Are there costs not captured in Table S7.-1?

☐ Yes (if yes, provide summary)

☐ No

Have you tracked the number of inspections as required by S7.A.4.b?

☐ Yes – Number _____

☐ No (if no, explain)

Have you tracked the number official enforcement actions as required by S7.A.4.b?

- ☐ Yes – Number _____
☐ No (if no, explain)

Have you tracked the number and types of public education activities as required by S7.A.4.b?

- ☐ Yes
☐ No (if no, explain)

If yes, list the types of education activities and the number of each.

S7.C.1 Public Education and Outreach

Have you developed and implemented a public education and outreach plan that addresses the topics and target audiences included in S7.C.1.a.i through S7.C.1.a.viii?

- ☐ Yes – Implementation Date _____
☐ No – Projected Implementation Date _____

If projected implementation date is more than two years after effective date of the permit, explain.

Have you developed and implemented a public education and outreach program designed to reach 100% of the target audiences identified in S7.C(1)(a)(v) through (viii), as required by S7.C.1.b?

- ☐ Yes – Implementation Date _____
☐ No – Projected Implementation Date _____

If projected implementation date is after the expiration date of the permit, explain

If you answered yes to one or more of the above questions, provide a summary here of the Public Education and Outreach Plan organized according to S7.C.1

S7.C.2 Public Involvement and Participation

Have you included ongoing opportunities for public involvement, as required by S7.C.2?

- ☐ Yes
☐ No (if no, explain)

Have you complied with applicable State and Local public notice requirements when implementing a public involvement and participation program, as required by S7.C.2?

- ☐ Yes
☐ No (if no, explain)

Have you created opportunities for the public to participate in the decision making processes involving the development, implementation and update of your entire SWMP, including a process for consideration of public comments, as required by S7.C.2.a?

- ☐ Yes – Implementation Date _____
☐ No – Projected Implementation Date _____

If projected implementation date is more than one year after the effective date of the permit, explain.

Have you made your SWMP, the SWMP documentation required under S7.A(3) and all submittals required by this permit, including your annual reports available to the public on the Permittee's website, as required by S7.C.2.b?

- ☐ Yes
☐ No (if no, explain)

If no, have you submitted the documentation required above to the Department for posting on the Department's website, in electronic format, as required by S7.C.2.b?

- ☐ Yes
☐ No (if no, explain)

If you answered yes to one or more of the above questions, provide a summary here of the Public Involvement and Participation Plan organized according to S7.C.2

S7.C.3 Illicit Discharge Detection and Elimination

Have you implemented an ongoing illicit discharge detection and elimination program, as required by S7.C.3?

- ☐ Yes – Implementation Date _____
☐ No – Projected Implementation Date _____

If projected implementation date is more than four years after the effective date of the permit, explain.

Have you developed a municipal storm sewer system map, as required by S7.C.3.a?

- ☐ Yes – Implementation Date _____ (If yes, attach a copy of the map)
☐ No – Projected Implementation Date _____

If projected implementation date is more than four years after the effective date of the permit, explain.

Does/will the above map include the location of all known municipal separate storm sewer outfalls and receiving waters; and structural stormwater BMPs owned, operated, or maintained by the Permittee, as required by S7.C.3.a.i?

- ☐ Yes
☐ No (if no, explain)

Does/will the above map include tributary conveyance systems, associated tributary drainage areas, and land uses, of all municipal separate storm sewer outfalls with a 24 inches nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems, and indicate type, material, and size where known, as required by S7. C.3.a.ii?

- ☐ Yes
☐ No (if no, explain)

Does/will the above map include all known and new connections to the Permittee's MS4 authorized or approved by the Permittee, as required by S7. C.3 a.iii?

- ☐ Yes
☐ No (if no, explain)

Does/will the above map include areas served by the Permittee's MS4 that discharge stormwater to groundwater, as required by S7 C.3.a.iv?

- ☐ Yes
☐ No (if no, explain)

Has the above been provided to co-permittees and secondary permittees when requested, as required by S7.C.3 a.v?

- ☐ Yes
☐ No (if no, explain)

Has a regulatory mechanism been put in place to effectively prohibit non-stormwater discharges, as required by S7.C.3.b?

- ☐ Yes – Implementation Date _____ (if yes provide reference)
☐ No – Projected Implementation Date _____

If projected implementation date is more than two years after the effective date of the permit, explain.

Does the regulatory mechanism above prohibit all types of non-stormwater discharges into your MS4 other than those authorized under a separate NPDES permit, as required by S7.C.3.b.i?

- ☐ Yes
☐ No (if no, explain)

Have any of the categories of non-stormwater discharges listed in S7.C.3.b.i been identified as significant sources of pollution?

- ☐ Yes (if yes, provide list)
☐ No

Have all appropriate enforcement provisions and procedures allowed under State law been included, as required by S7.C.3.b.ii?

- ☐ Yes
☐ No (if no, explain)

Has a program for the detection and elimination of illicit discharges been implemented, as required by S7.C.3.c?

- ☐ Yes – Implementation Date _____
☐ No – Projected Implementation Date _____

If projected implementation date is more than four years after the effective date of the permit, explain.

Have procedures for the detection and removal of illicit connections to the permittee's municipal storm sewer system, including sanitary sewer or interior floor drain connections been incorporated, as required by S7.C.3.c.i?

- ☐ Yes
☐ No (if no, explain)

Have three watersheds been prioritized for screening as, required by S7.C.3.c.i?

- ☐ Yes – List _____
☐ No – Projected Implementation Date _____

If projected implementation date is more than three years after the effective date of the permit, explain.

Has at least one of the priority watersheds been screened each year after the 3rd year from the effective date of the permit, as required by S7.C.3.c.ii?

- ☐ Yes – Implementation Date _____
☐ No – Projected Implementation Date _____

If projected implementation date is more than four years after the effective date of the permit, explain.

Have procedures for the reporting and correcting or removing illicit connections and other illicit discharges when they are suspected or identified, been adopted and implemented, as required by S7.C.3.c.iii?

- ☐ Yes – Implementation Date _____
☐ No – Projected Implementation Date _____

If projected implementation date is more than two years after the effective date of the permit, explain.

Have you developed a procedure to investigate the source of the connection, the nature and volume of the discharger through the connection and responsible party for the connection upon discovery or receiving a report of an illicit connection within 21 days, as required by S7.C.3.c.iii?

- ☐ Yes
☐ No (if no, explain)

Have you ensured termination of the connection within 180 days, using enforcement authority as needed, upon confirmation of the illicit nature of a storm drain connection, as required by S7.C.3.c.iii?

- ☐ Yes
☐ No (if no, explain)

Have you developed and implemented procedures to prevent, respond to, and clean up spills and improper disposal into municipal separate storm sewers owned or operated by the Permittee, as required by S7.C.3.c.iv?

- ☐ Yes – Implementation Date _____
☐ No – Projected Implementation Date _____

If projected implementation date is more than two years after the effective date of the permit, explain.

Have you investigated or referred to the appropriate agency, within 7 days on average, any complaints/reports or monitoring information that indicates a potential illicit discharge, spill, or illegal dumping, as required by S7.C.3.c.iv?

- ☐ Yes
☐ No (if no, explain)

Have you investigated or referred as soon as possible within 24 hours, those problems/violations judged to be urgent or severe, or reported as emergencies, as required by S7.C.3.c.iv?

- ☐ Yes
☐ No (if no, explain)

Have you established and publicly listed a citizen complaint/report telephone number as required by S7.C.3.c.v?

- ☐ Yes – List telephone number _____
☐ No – Projected Implementation Date _____

If projected implementation date is more than two years after the effective date of the permit, explain.

Has training been provided to those responsible for identification, investigation, termination, cleanup, and reporting illicit discharges, including spills, improper disposal, and illicit connections, as required by S7.C.3.d.i?

- ☐ Yes – Implementation Date _____
☐ No – Projected Implementation Date _____

If projected implementation date is more than one year after the effective date of the permit, explain.

Have you completed follow-up training, as required by S7.C.3.d.i?

- ☐ N/A (First year of permit)
☐ Yes
☐ No (if no, explain)

Has training been provided to all municipal field staff, which as part of their normal job responsibilities might come into contact with or otherwise observe an illicit discharge or illicit connection to the storm sewer system, on the identification of an illicit discharge/connection and on the proper procedures for reporting the illicit discharge/connection, as required by S7.C.3.d.ii?

- ☐ Yes – Implementation Date _____
☐ No – Projected Implementation Date _____

If projected implementation date is more than two years after the effective date of the permit, explain.

Have you completed follow-up training, as required by S7.C.3.d.ii?

- ☐ N/A (First year of permit)
☐ Yes
☐ No (if no, explain)

If you answered yes to one or more of the above questions, provide a summary here of the Illicit Discharge Detection and Elimination Plan organized according to S7.C.3

S.7.C.4 Controlling Stormwater Runoff from New Development, Redevelopment and Construction Sites

Have you implemented a program to reduce pollutants in stormwater runoff to your regulated MS4 from new development, redevelopment and construction site activities that disturb a land area 1 acre or greater, including sites less than 1 acre but part of a larger common plan, as required by S.7.C.4?

- ☐ Yes
☐ No (if no, explain)

Is this program enforced, as required by S.7.C.4?

- ☐ Yes
☐ No (if no, explain)

Are you applying the Technical Thresholds in Appendix 1 of this permit to new development, redevelopment and construction site activities that disturb a land area 1 acre or greater, including sites less than 1 acre but part of a larger common plan, as required by S.7.C.4?

- ☐ Yes
☐ No (if no, explain)

Does the program include a regulatory mechanism that addresses runoff from new development, redevelopment and construction site activities that disturb a land area 1 acre or greater, including sites less than 1 acre but part of a larger common plan, as required by S.7.C.4.a?

- ☐ Yes – Implementation Date _____
☐ No – Projected Implementation Date _____

If projected implementation date is more than two years after the effective date of the permit, explain.

Does the regulatory mechanism include the minimum requirements, technical thresholds and definitions in Appendix 1 for new development, redevelopment and construction sites as required by S.7.C.4.a?

- ☐ Yes
☐ No (if no, explain)

Are more stringent requirements being used that provide an equal level of pollution control and equal protection of receiving waters than those in Appendix 1, as required by S.7.C.4.a.i?

- ☐ Yes
☐ No (if no, explain)

Does the regulatory mechanism include the adjustment and variance criteria in Appendix 1, as required by S.7.C.4.a.ii?

- ☐ Yes
☐ No (if no, explain)

Does the regulatory mechanism utilize a site planning process, BMP selection and design criteria that is from the 2005 Stormwater Management Manual for Western Washington, or one determined by Ecology to be an equivalent manual, as described in S.7.C.4.a.iii?

- ☐ Yes
☐ No (If no, please attach required documentation describing how the criteria and requirements will protect water quality, reduce the discharge of pollutants to the maximum extent practicable and satisfy the state AKART requirements, as required in S.7.C.4.a.iii)

Does the regulatory mechanism use the site planning process, BMP selection and design criteria from the 2005 Stormwater Management Manual for Western Washington, or an equivalent manual, as described in S.7.C.4.a.iii?

- ☐ Yes
☐ No (if no, explain)

Does the regulatory mechanism include legal authority to inspect private facilities, as required in S.7.C.4.a.iv?

- ☐ Yes
☐ No (if no, explain)

Does the regulatory mechanism include source reduction approaches, as required in S.7.C.4.a.v?

- ☐ Yes
☐ No (if no, explain)

Does the program include a process of permits, plan review, inspections and enforcement capability for both public and private projects, as required in S.7.C.4.b?

☐ Yes – Implementation Date _____

☐ No – Projected Implementation Date _____

If projected implementation date is more than two years after the effective date of the permit explain.

Do you review site plans for proposed development activities, as required in S.7.C.4.b.i?

☐ Yes

☐ No (if no, explain)

If yes, what percent of site plans have been reviewed?) _____

Do you inspect, prior to clearing and construction, development sites hydraulically near a sediment/erosion-sensitive feature based on definitions and requirements in appendix 4 of the permit, S.7.C.4.b.ii?

☐ Yes

☐ No (if no, explain)

If yes, what percent of development sites have been inspected?) _____

Do you inspect permitted development sites during construction?

☐ Yes

☐ No (if no, explain)

Do you inspect permitted development sites upon completion of construction?

☐ Yes

☐ No (if no, explain)

Do you use an enforcement mechanism if necessary and ensure a maintenance plan is completed for the facility, as required in S.7.C.4.b.iv?

☐ Yes

☐ No (if no, explain)

Do you have an inspection program designed to inspect all sites that disturb a land area 1 acre or greater, including sites less than 1 acre but part of a larger common plan, as required by S.7.C.4.b.v?

☐ Yes

☐ No (if no, explain)

Does your program include a regulatory mechanism that ensures adequate long-term operation and maintenance of post-construction stormwater facilities/BMPs for new development, redevelopment and construction site activities that disturb a land area 1 acre or greater, including sites less than 1 acre but part of a larger common plan, as required by S.7.C.4.c?

☐ Yes – Implementation Date _____

☐ No – Projected Implementation Date _____

If projected implementation date is more than two years after the effective date of the permit, explain

Does the ordinance or other enforceable mechanism include maintenance standards as protective or more protective than those specified in Chapter 4 of Volume V of the Stormwater Management Manual for Western Washington (2005), as required by S7.C.4.c.i?

- ☐ Yes, maintenance standards from Chapter 4 of Volume V of the Stormwater Management Manual for Western Washington (2005) adopted.
- ☐ Yes, maintenance standards from other Ecology Approved Manual Adopted Other Manual Name _____
- ☐ Yes, other Maintenance standards as protective or more protective adopted.
- ☐ No *(if no, explain)*

Does the ordinance or other enforceable mechanism include requirements to inspect all new stormwater treatment and flow control facilities, annually or otherwise, as required by S7.C.4.c.ii?

- ☐ Yes
- ☐ No *(if no, explain)*

Does the ordinance or other enforceable mechanism include requirements to inspect all new flow control and water treatment every 6 months during the period of heaviest housing construction, as required by S7.C.4.c.iii?

- ☐ Yes
- ☐ No *(if no, explain)*

Does the program have a procedure for keeping inspection, maintenance and enforcement action records, as required by S7.C.4.d?

- ☐ Yes
- ☐ No *(if no, explain)*

Does the program have a process to make available copies of the Notice of Intent for construction and industrial activities, as required by S7.C.4.e?

- ☐ Yes
- ☐ No *(if no, explain)*

Does the program provide training for staff involved in Controlling Stormwater Runoff from New Development, Redevelopment and Construction Sites, as required by S7.C.4.f?

- ☐ Yes
- ☐ No *(if no, explain)*

S7.C.5 Pollution Prevention and Operation and Maintenance for Municipal Operations

Do you have an operations and maintenance (O&M) program that requires training and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations, as required by S7.C.5?

- ☐ Yes – Implementation Date _____
☐ No – Projected Implementation Date _____

If projected implementation date is more than three years after the effective date of the permit, explain.

Have you adopted maintenance standards as protective or more protective than those specified in Chapter 4 of Volume V of the Stormwater Management Manual for Western Washington (2005), as required by S7.C.5.a?

- ☐ Yes, maintenance standards from Chapter 4 of Volume V of the Stormwater Management Manual for Western Washington (2005) adopted.
☐ Yes, maintenance standards from other Ecology Approved Manual Adopted Other Manual Name _____
☐ Yes, other Maintenance standards as protective or more protective adopted.
☐ No (if no, explain)

Have all municipally owned or operated stormwater treatment and flow control facilities been inspected in the reporting period, as required by S7.C.5.b?

- ☐ Yes
☐ No (if no, explain)

In accordance with the adopted maintenance standards, have appropriate maintenance action been taken as a result of the above inspections, as required by S7.C.5.b?

- ☐ Yes
☐ No (if no, explain)

Has appropriate the inspection frequency been changed based on inspection results, as required by S7.C.5.b?

- ☐ Yes (if yes, explain)
☐ No

Have you conducted spot checks of potentially damaged treatment and flow control facilities after major storm events, as required by S7.C.5.c?

- ☐ Yes
☐ No (if no, explain)

Have appropriate repairs or maintenance actions take place based on above inspections, as required by S7.C.5.c?

- ☐ Yes
☐ No (if no, explain)

Have all catch basins and inlets owned and operated by the Permittee been inspected at least once, as required by S7.C.5.d?

- ☐ Yes – Completion Date _____
☐ No – Projected Completion Date _____

If projected completion date is more than five years after the effective date of the permit, explain.

Have catch basins and inlets inspected under S7.C.5.d in the reporting period, been cleaned, as required by S7.C.5.d?

- ☐ Yes
☐ No (if no, explain)

Has decant water been disposed of in accordance with Appendix 5, as required by S7.C.5.d?

- ☐ Yes
☐ No (if no, explain)

Have practices to reduce stormwater impacts associated with runoff from public streets, public parking lots, public roads, highways, and public road maintenance activities been established and implemented, as required by S7.C.5.f?

- ☐ Yes – Implementation Date _____
☐ No – Projected Implementation Date _____

If projected implementation date is more than three years after the effective date of the permit, explain.

Do the above practices address pipe cleaning?

- ☐ Yes
☐ No (if no, explain)

Do the above practices address cleaning of culverts that convey stormwater in ditch systems?

- ☐ Yes
☐ No (if no, explain)

Do the above practices address ditch maintenance?

- ☐ Yes
☐ No (if no, explain)

Do the above practices address street cleaning?

- ☐ Yes
☐ No (if no, explain)

Do the above practices address road repair and resurfacing, including pavement grinding?

- ☐ Yes
☐ No (if no, explain)

Do the above practices address snow and ice removal?

- ☐ Yes
☐ No (if no, explain)

Do the above practices address utility installation?

- ☐ Yes
☐ No (if no, explain)

Do the above practices address maintaining roadside areas, including vegetation management?

- ☐ Yes
☐ No (if no, explain)

Do the above practices address dust control?

- ☐ Yes
☐ No (if no, explain)

Do the above practices address pavement striping maintenance?

- ☐ Yes
☐ No (if no, explain)

Have policies and procedures to reduce pollutants in discharges from all lands owned or maintained by the Permittee, including but not limited to: parks, open space, road right-of-way, maintenance yards, and at stormwater treatment and flow control facilities been established and implemented, as required by S7.C.5 g?

- ☐ Yes – Implementation Date _____
☐ No – Projected Implementation Date _____

If projected implementation date is more than three years after the effective date of the permit, explain

Do the above policies and procedures address application of fertilizer, pesticides, and herbicides including the development of integrated pest management program?

- ☐ Yes
☐ No (if no, explain)

Do the above policies and procedures address sediment and erosion control?

- ☐ Yes
☐ No (if no, explain)

Do the above policies and procedures address landscape maintenance and vegetation disposal?

- ☐ Yes
☐ No (if no, explain)

Do the above policies and procedures address trash management?

- ☐ Yes
☐ No (if no, explain)

Do the above policies and procedures address building exterior cleaning and maintenance?

- ☐ Yes
☐ No (if no, explain)

Has training for appropriate employees of the Permittee whose construction, operations, or maintenance job functions may impact stormwater quality been conducted, as required by S7 C.5 h?

- ☐ Yes – Implementation Date _____
☐ No – Projected Implementation Date _____

If projected implementation date is more than three years after the effective date of the permit, explain.

Does the above training address importance of protecting water quality?

- ☐ Yes
☐ No (if no, explain)

Does the above training address the requirements of this permit, operation and maintenance standards?

- ☐ Yes
☐ No (if no, explain)

Does the above training address inspection procedures?

- ☐ Yes
☐ No (if no, explain)

Does the above training address selecting appropriate BMPs?

- ☐ Yes
☐ No (if no, explain)

Does the above training address ways to perform their job activities to prevent or minimize impacts to water quality?

- ☐ Yes
☐ No (if no, explain)

Does the above training address procedures for reporting water quality concerns, including potential illicit discharges?

- ☐ Yes
☐ No (if no, explain)

Has a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee, that are not covered under the Industrial Stormwater General permit, been developed and implemented, as required by S7.C.5.i?

☐ Yes – Implementation Date _____

☐ No – Projected Implementation Date _____

If projected implementation date is more than three years after the effective date of the permit, explain.

If you answered yes to one or more of the above questions, provide a summary here of the Pollution Prevention for Municipal Operations Plan organized according to S7.C.5

S9. Reporting Requirements

Have you submitted your annual Report prior to March 31?

- ☐ Yes
☐ No (if no, explain)

In your annual report did you include your status of compliance with the conditions of this permit, including; the status of implementation of the components of the stormwater management program, an implementation schedule?

- ☐ Yes
☐ No (if no, explain)

If you missed meeting your deadline, did you report to the Department why the requirement was not met and did you inform the Department of how the requirements will be met in the future, including projected implementation date?

- ☐ Yes
☐ No (if no, explain)

In your report did you provide a comparison of the program implementation results to the performance standards established in this permit?

- ☐ Yes
☐ No (if no, explain)

Did you report results of information collected and analyzed, including monitoring data, if any, during the reporting period, (as defined at 40 CFR 122.34(g) (3) (ii))? Attach these results to this report.

- ☐ Yes
☐ No (if no, explain)

Did you report an assessment of the appropriateness of the BMPs you have identified for each component of the SWMP as required in S7.C?

- ☐ Yes
☐ No (if no, explain)

Did you include it in your report notices if you are relying on another government entity to satisfy some of your permit obligations, as defined at 40 CFR 122.34(g)(3)(v)?

- ☐ Yes
☐ No (if no, explain)

Provide a list of all staff training over the past year. Include the number of staff, department, type of training and the date of training.

List any storm water related activities planned for the next reporting cycle that have not already been listed above.